

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

AMERICAN ASSOCIATION OF UNIVERSITY  
PROFESSORS, ET AL.,

Plaintiffs,

v.

MARCO RUBIO, ET AL.

Defendants.

Case No. 1:25-cv-10685 (WGY)

**STIPULATION AND PROPOSED ORDER**

**WHEREAS**, Plaintiffs American Association of University Professors, American Association of University Professors-Harvard Faculty Chapter, American Association of University Professors at New York University, Rutgers American Association of University Professors-American Federation of Teachers, and Middle East Studies Association (“Plaintiffs”), by and through their undersigned counsel, and Defendants Marco Rubio, Kristi Noem, Todd Lyons, and Donald J. Trump (“Defendants”) have stipulated and agreed that all statements made by government officials and agents, and quotes attributed to them, in the following documents are authenticated pursuant to Federal Rule of Evidence 901:<sup>1</sup>

1. Secretary of State Marco Rubio’s March 6, 2025 post on X (available at <https://perma.cc/KD9R-BNV3>);
2. Department of Homeland Security’s March 9, 2025 post on X (available at <https://perma.cc/3NNQ-235L>);

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<sup>1</sup> Defendants do not waive hearsay objections to any statements other than those by government officials and agents stipulated to in this document.

3. Secretary of State Marco Rubio's March 9, 2025 post on X (available at <https://perma.cc/Q7EH-M4LW>);
4. President Donald J. Trump's March 10, 2025 post on Truth Social (available at <https://perma.cc/Z5PU-7MZT>);
5. White House Press Secretary Karoline Leavitt's March 11, 2025 Press Briefing transcript (available at <https://perma.cc/XAJ6-N2CD>);
6. Secretary of State Marco Rubio's March 12, 2025 remarks to the press in Shannon, Ireland (available at <https://www.state.gov/secretary-of-state-marco-rubio-remarks-to-press/>);
7. Deputy Secretary of Homeland Security Tony Edgar's March 13, 2025 interview with NPR (available at <https://perma.cc/Q45C-6B9A>);
8. Vice President J.D. Vance's March 13, 2025 Fox New Interview Transcript (available at Dkt. No. 14-18);
9. The March 14, 2025 Department of Homeland Security Press Release (available at <https://perma.cc/7YAG-38XF>);
10. Secretary of State Mark Rubio's March 16, 2025 interview on CBS's Face the Nation (available at <https://perma.cc/DV8P-2CWZ>);
11. Department of Homeland Security Assistant Secretary for Public Affairs Tricia McLaughlin's March 19, 2025 post on X (available at <https://perma.cc/JE82-K8CM>);
12. Secretary of State Marco Rubio's March 27, 2025 remarks during a Joint Press Availability with Guyanese President Irfaan Ali (available at <https://perma.cc/8LC9-S86R>);
13. Secretary of State Marco Rubio's March 28, 2025 remarks to the press (available at <https://perma.cc/5YPB-GBGX>);

14. Secretary of State Marco Rubio's April 8, 2025 interview on Triggered with Don Jr. (available at <https://perma.cc/6RD7-S8DN>);

15. The April 9, 2025 Department of Homeland Security Press Release (available at <https://perma.cc/ZSM5-X5GE>);

16. White House Deputy Chief of Staff Stephen Miller's April 14, 2025 interview with Fox News (available at <https://bsky.app/profile/atrupar.com/post/3lmroj5yzz723>);

17. Secretary of State Marco Rubio's April 17, 2025 interview on the Ben Shapiro Show (available at <https://perma.cc/K92W-A4XN>);

18. Department of Homeland Security Assistant Secretary for Public Affairs Tricia McLaughlin's April 30, 2025 post on X (available at <https://perma.cc/T6JE-3H9Y>);

19. The May 7, 2025 NPR article quoting Department of Homeland Security Assistant Secretary for Public Affairs Tricia McLaughlin (available at <https://perma.cc/U9JK-G75Z>);

20. Secretary of State Marco Rubio's May 7, 2025 post on X (available at <https://perma.cc/RNB6-YUUH>);

21. Department of Homeland Security Assistant Secretary for Public Affairs Tricia McLaughlin's May 8, 2025 post on X (available at <https://perma.cc/TA4V-8HDP>);

22. The January 30, 2025 White House Fact Sheet Titled "Fact Sheet: President Donald J. Trump Takes Forceful and Unprecedented Steps to Combat Anti-Semitism" (available at <https://www.whitehouse.gov/fact-sheets/2025/01/fact-sheet-president-donald-j-trump-takes-forceful-and-unprecedented-steps-to-combat-anti-semitism/>).

Dated: New York, New York  
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*Attorneys for Defendants*

SO ORDERED

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Hon. William G. Young, U.S. District Judge